

REMARKS

This is a Response to the Official Action mailed on March 4, 2009. Claims 1-20, 22-31, and 55-58 are pending, with claims 32-54 withdrawn. The claims are unchanged from the previous response. The Office Action has withdrawn its previous grounds of rejection, and newly introduces Ahn et al., KR Patent Publication No. KR2003-0000794 as the primary reference for a rejection of claim 1-20, 22-31, and 55-58 under 35 U.S.C. §103(a). It is respectfully submitted that these rejections are not well founded and should be withdrawn.

The newly introduced primary referenced of Ahn is discussed first. As stated in the first sentence of its Abstract, Ahn presents a “circuit emulator” that is to be “connected ... between the host system and the target embedded system”. This is shown in Ahn’s Figure 1, where the “circuit emulator 2” is connected between the “host system 1” and “target embedded system 3”. As described there beginning with the first paragraph on page 3, the purpose of this “circuit emulator” is for the “development of the target embedded system”. And as described in the following paragraphs, all of Ahn’s teachings are directed to this “development of this embedded system”. This is noted in the Office Action as well: for example in its rejection of claim 1, where (p.2, last two lines, and p.3, lns. 7-8) the cited elements of Ahn are described as being “in order to provide the development environment of the target embedded system (3)”. The Office Action also notes (p.3, lns. 11-12) the “circuit simulator” has “two interfaces as shown in [Ahn’s] Fig.1”, which again reflects that all of Ahn’s teachings are directed at this “circuit emulator” whose function is for the “development of the target embedded system” while connected to both the “host system” and the “target embedded system”.

In its rejections of claim 1, the Office Action (p. 3, lns. 9-1, and p. 10, lns. 6-7) acknowledges that “Ahn. et al. fail to expressly disclose the web server emulation device is a portable storage device” and cites Yang (U.S. Patent No. 6,733,329 B2 to Yang) and Kuo (U.S. Patent Publication No. 2003/0185083 to Kuo) for this purpose in sections 3-1 and 6-1, respectively, of the Office Action. Portable storage devices are known in the art. However, as described in the previous paragraph, the teachings of Ahn make no sense except in the context of the “circuit emulator” being connected between the “host system” and “target embedded system”, as in its Figure 1. To embody Ahn’s “circuit emulator” as such a “portable storage device” consequently makes no sense. Because of this, it is respectfully submitted that not only

is it *not* oblivious to combine Ahn with the secondary references as suggested in the Office Action, but that it would contrary to the purposes and teachings of Ahn to embody the “circuit emulator” disclosed these as a “portable storage device”.

It should also be noted that all of Ahn’s teachings are directed as a *circuit* emulator. In contrast, what claim 1 presents is a “web server emulation device” that “is a portable storage device” “for serving web content … to a digital appliance for end use of at least part of the web content”. As Ahn states, for example, at the beginning of the second paragraph of its Abstract or the last paragraph on page 3, its “circuit emulator” is “based on the web”. However, it is respectfully submitted that this is not “for serving web content”, as recited in the claim; rather, it is respectfully submitted that what Ahn is describing is a Graphic User Interface (GUI) “*based* on the web”[p.3, last paragraph, emphasis added]. That is, a user would interact with Ahn’s “circuit emulator” as if it were a web page, but, as described there in the second paragraph on page 3 and developed throughout Ahn’s disclosure, this is just the form of the Graphic User Interface (GUI) takes when presented to the user for emulating the target embedded system. This is something different from a “portable storage device” “for serving web content … to a digital appliance for end use of at least part of the web content”, as is present in claim 1.

Because of this, it is respectfully submitted that the device of claim1 is not disclosed by Ahn or the secondary references of Yang or Kuo, nor obvious from a combination of these as suggested by the Office Action. Consequently, it is respectfully submitted that a rejection of claim 1 under 35 U.S.C. §103(a) based on Ahn as the primary reference is in error and should be withdrawn.

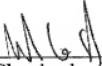
Concerning claim 20, this is an independent system claim that again includes the limitations of claim 1 and is rejected on grounds similar to those for claim 1. Consequently, the arguments given above with respect to claim 1 correspondingly apply to claim 20

Therefore, for at least these reasons, it is respectfully submitted that a rejection of independent claims 1 and 20 (along with dependent claims 2-19, 22-31, and 55-58) under 35 U.S.C. §103(a) based on Ahn as the primary reference is in error and should be withdrawn.

Conclusion

Accordingly, it is believed that this application is now in condition for allowance and an early indication of its allowance is solicited. However, if the Examiner has any further matters that need to be resolved, a telephone call to the undersigned would be appreciated.

Respectfully submitted,



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9/3/09

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